



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JJD:JLG
F. #2020R00632

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 20, 2025

REQUEST TO BE FILED UNDER SEAL

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Vladimir Antonio Arevalo-Chavez
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

As directed by the Court on May 15, 2025, the government respectfully submits this letter to provide the Court and counsel for defendant Vladimir Antonio Arevalo-Chavez with certified English-language translations of the following documents, the Spanish-language originals of which were attached to the government's May 14, 2025 letter: (1) an INTERPOL Red Notice, issued February 19, 2019, for the defendant's arrest (Exhibit A); (2) an arrest warrant, issued in connection with the charge of Terroristic Organizations, document number 3622, dated May 29, 2018 (Exhibit B);¹ and (3) an arrest warrant, issued in connection with the defendant's conviction in absentia for the crime of Illicit Groupings, for which he received a sentence of fourteen years' imprisonment, and the crime of Aggravated Homicide, for which he received a sentence of 25 years' imprisonment, document number 29, dated January 6, 2025 (Exhibit C).

The government respectfully reiterates its request for the Court to dismiss the indictment against the defendant without prejudice as soon as possible. Indeed, the government's unopposed motion to dismiss has been pending for well over a month now, with the primary issue before the Court being whether to dismiss with or without prejudice. As noted in its May 14 letter, because the government has provided specific and non-conclusory justifications for the instant

¹ The defendant is subject number 53, on page 9. This is the charge for which the Red Notice, which remains active, issued.

motion, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the Court should have no hesitancy in ruling.²

Finally, the government respectfully requests the continued sealing of all filings related to the motion to dismiss, including this letter and its attachments. As the Court is aware, these filings include the details of charges pending against the defendant in a foreign country, which may not have been made public there. Therefore, in an abundance of caution, to protect the integrity of the foreign prosecutions, and for the reasons set forth in the government's previous filings regarding operational security, the government respectfully requests that this letter be filed and maintained under seal.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
John J. Durham
Assistant United States Attorney
(631) 715-7900

Enclosures

cc: Louis M. Freeman, Esq. (by email)
Thomas H. Nooter, Esq. (by email)

² Defense counsel's May 14, 2025 letter to the Court again raises the specter of bad faith, in an effort to persuade the Court to dismiss the indictment with prejudice. The government respectfully submits that no further briefing on this issue is warranted; however, should the Court elect to entertain this argument, the government respectfully seeks leave to file further briefing at the appropriate time.